

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

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<p>1 do. You know, security officers will often times</p> <p>2 have what's called a patrol audit system or a guard</p> <p>3 tour system. That is not something police officers</p> <p>4 typically do. So there are differences in the way</p> <p>5 they approach, you know, whatever the problem is, or</p> <p>6 whatever their role is. So I wouldn't expect the</p> <p>7 police officers as a matter of good practice to, you</p> <p>8 know, do written daily activity reports, for</p> <p>9 example.</p> <p>10 Q. And your point there about patrol audits</p> <p>11 actually ties in with a question I was about to ask</p> <p>12 you. Which is during that time period, did</p> <p>13 United Inn require or receive patrol audit</p> <p>14 information from the off-duty police officers who</p> <p>15 worked from 10:00 p.m. to 2:00 a.m. at the hotel?</p> <p>16 A. Let's make sure we're talking about the</p> <p>17 same thing. A patrol audit system is basically</p> <p>18 where you've got sensors all over the property that</p> <p>19 you scan. Either QR codes, bar codes, something</p> <p>20 like that. Or you've got some kind of GPS tracking</p> <p>21 that they use to track where the officers are. I'm</p> <p>22 not aware of any such system existing in United Inn.</p> <p>23 It is possible there may have been a system on the</p> <p>24 police officers' patrol cars that allowed for GPS</p> <p>25 tracking. It is also possible they had some kind of</p>	<p>1 on their employees?</p> <p>2 MR. ALLUSHI: Objection. Go ahead.</p> <p>3 A. So my understanding was that most of his</p> <p>4 employees were either known to him or came to him by</p> <p>5 way of referrals from other hotel operators. So</p> <p>6 from those folks, he told me that they did not</p> <p>7 conduct criminal background checks. What he told me</p> <p>8 on the other folks is that he would do criminal</p> <p>9 background investigations.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q. Your testimony is that he told you that he</p> <p>12 would conduct background checks on certain of his</p> <p>13 employees?</p> <p>14 A. On people that were not known to him or</p> <p>15 directly referred to him by another hotel operator</p> <p>16 or calling someone from one of the associations.</p> <p>17 Q. But you did not see any proof or</p> <p>18 documentation of such background checks, is that</p> <p>19 correct?</p> <p>20 MR. ALLUSHI: Objection.</p> <p>21 A. No, sir, I did not. As I explained, you</p> <p>22 know, the way background checks are done nowadays,</p> <p>23 you can either get a formal report from the</p> <p>24 background check company or you can -- in some</p> <p>25 instances you can log in to a portal and get access</p>
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<p>1 GPS tracking on their cell phones. But I'm not</p> <p>2 aware of anything that United Inn required or</p> <p>3 provided in that regard.</p> <p>4 Q. During that time period, did United Inn</p> <p>5 have one United Inn employee working at the property</p> <p>6 from 9:00 p.m. to 6:00 a.m.?</p> <p>7 A. That's my understanding, yes, sir.</p> <p>8 Q. During that time period, did United Inn</p> <p>9 have one United Inn employee working on the property</p> <p>10 for five hours during the night without any off-duty</p> <p>11 police officers also working?</p> <p>12 A. Going to make me do my math. 9:00 to</p> <p>13 6:00 is what we're talking about. 9:00 p.m. to</p> <p>14 6:00 a.m. is what we're talking about minus the four</p> <p>15 hours, right? So six, seven, eight, nine, minus</p> <p>16 four, that's five hours, yes, sir.</p> <p>17 Q. During the time period, 2017 to 2019, did</p> <p>18 United Inn conduct a formal assessment, formal</p> <p>19 risk -- assessment, excuse me, of the property?</p> <p>20 A. My understanding is they only did an</p> <p>21 informal risk assessment of the property.</p> <p>22 Q. And I think you've answered this, but to</p> <p>23 be clear, during that time period, based on your</p> <p>24 interview of Mr. Shareef and your review of the</p> <p>25 documents, did United Inn conduct background checks</p>	<p>1 to the reports without necessarily printing or</p> <p>2 saving the report. Or in some cases you can just go</p> <p>3 into a county website and go do the background check</p> <p>4 yourself.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. During that time period, did United Inn</p> <p>7 pay some of their employees in cash and not retain</p> <p>8 records of the payments?</p> <p>9 A. I don't know the answer to that, sir. I</p> <p>10 think he testified about that in his deposition.</p> <p>11 But I don't recall exactly what he said.</p> <p>12 Q. During that time period, did United Inn</p> <p>13 monitor online reviews about the hotel?</p> <p>14 A. I think he was asked about that as well.</p> <p>15 I don't think they did. I don't have a specific</p> <p>16 recollection of it.</p> <p>17 Q. During that time period, did United Inn</p> <p>18 monitor websites advertising sex for money?</p> <p>19 A. I don't think so.</p> <p>20 Q. During that time period, did United Inn</p> <p>21 hold regular crime prevention meetings?</p> <p>22 MR. ALLUSHI: Objection. Go ahead, Karim.</p> <p>23 A. I'm going to say no. That's not something</p> <p>24 that I'm aware of being a practice in the hotel-type</p> <p>25 facilities. That's something that's a practice</p>